

EXHIBIT

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RELMAN, DANE & COLFAX PLLC



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Practice Highlights



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The Firm

Relman, Dane & Colfax is a civil rights law firm based in Washington, D.C., with additional offices in Ohio and New Mexico. We litigate civil rights cases in the areas of housing, lending, employment, public accommodations, education, and police accountability. Our national practice includes individual and class action lawsuits on behalf of plaintiffs who have suffered discrimination and harassment on the basis of race, national origin, color, religion, sex, disability, age, familial status, source of income, and sexual orientation.

The firm also provides legal counsel to progressive companies that demonstrate a commitment to best practices in the way they conduct business. Such counsel includes representation of financial institutions in reporting to their regulators on fair lending and fair servicing issues. We conduct investigations and provide counseling regarding consumer protection, privacy, lending, employment, whistleblower, and federal regulatory matters. Our practice also includes analysis and strategy regarding public policy issues and proposed legislation affecting civil rights.

Cases in the News

Class Certified in Firm's Long-Running Race Discrimination Case against Secret Service

On February 25, 2013, U.S. District Judge Richard Roberts certified a class of 120 current and former African-American Secret Service Agents, ruling that their claims of pattern and practice disparate treatment and disparate impact in promotions to supervisory levels may proceed as a class action. In its opinion, the Court not only rejected all of Defendant's arguments against class certification, but also rejected Defendant's challenge to Plaintiffs' statistical evidence of discrimination, instead holding that Plaintiffs' expert offered "relevant" and "reliable" evidence of discrimination that was corroborated by the sworn testimony of over 60 current and former African-American Agents. The Court's rulings mark the latest victories in the Firm's long-running *Moore, et al. v. Napolitano* litigation that began in 2000, and has included several sanctions against Defendants for discovery misconduct.

Federal Court Permits Design and Construction Claims Against Architect to Proceed on Continuing Violation Theory

On January 29, 2013, the U.S. District Court for the Western District of Virginia denied an architect's summary judgment motion on statute of limitations grounds, holding that the National Fair Housing Alliance (NFHA) and Paralyzed Veterans of America (PVA) may proceed with claims that the architect is liable for violations of the design and construction requirements of the Fair Housing Act at apartment buildings in North Carolina and South Carolina, even though the architect's work on one project ended more than two years before suit was filed. [Read more.](#)

Baltimore Settles Landmark Fair Lending Case Against Wells Fargo

On July 12, 2012, the City of Baltimore resolved its landmark fair lending lawsuit against Wells Fargo, filed on the City's behalf by Relman, Dane & Colfax over four years ago.

Practice Areas

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Compliance

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Quick Links

[Complaint filed in *Scott v. Croom*](#)

[Complaint filed in *Carter v. Housing Authority of the Town of Winchester*](#)

[Relman, Dane & Colfax is currently hiring Paralegals.](#)

[Complaint filed in *Ross v. Choice Hotels* public accommodations discrimination case](#)

Resolution of the suit was announced concurrently with an announcement by the United States Department of Justice that it has reached a national fair lending settlement with Wells Fargo worth at least \$175 million. To read more about the case, click [here](#).

Relman, Dane & Colfax PLLC – Lead Attorneys in *Morgan v. Richmond School of Health and Technology, Inc.*, No. 3:12-cv-00373-JAG (E.D. Va.)

John P. Relman

John P. Relman is the founder and director of Relman, Dane & Colfax PLLC. Since 1986, Mr. Relman has represented scores of plaintiffs and public interest organizations in individual and class action discrimination cases in federal court. From 1989 to 1999, Mr. Relman served as project director of the Fair Housing Project at the Washington Lawyers' Committee for Civil Rights and Urban Affairs. Under his leadership the project achieved national recognition, winning some of the largest housing, lending, and public accommodations discrimination jury verdicts and settlements obtained in the country.

Prior to joining the Washington Lawyers' Committee, Mr. Relman clerked for the Honorable Sam J. Ervin III of the U.S. Court of Appeals for the Fourth Circuit and the Honorable Joyce Hens Green of the U.S. District Court for the District of Columbia. Mr. Relman's better-known cases include *Timus v. William J. Davis, Inc.* (\$2.4 million jury verdict for housing discrimination against families with children); *Dyson v. Denny's Restaurants* (\$17.725 million class settlement for racial discrimination against customers); *Pugh v. Avis Rent-A-Car* (\$5.4 class settlement for racial discrimination in the rental of cars); *Gilliam v. Adam's Mark Hotels* (\$2.1 million class settlement for racial discrimination against guests); and *Kennedy v. City of Zanesville* (\$10.8 million race discrimination jury verdict). Mr. Relman has written and lectured extensively in the areas of fair housing and fair lending law and practice and has provided numerous training classes and seminars for plaintiffs' lawyers, fair housing organizations, the real estate industry, and lending institutions. He is the author of *Housing Discrimination Practice Manual*, published by the West Group.

Mr. Relman teaches public interest law at Georgetown University Law Center, where he serves as an adjunct professor. He received his law degree from the University of Michigan in 1983 and undergraduate degree from Harvard in 1979.

Glenn Schlactus

Glenn Schlactus is Counsel at Relman, Dane & Colfax PLLC, where he represents individuals and organizations in cases under federal fair lending laws and other federal and state anti-discrimination and consumer protection laws.

Mr. Schlactus represented the cities of Baltimore and Memphis in fair lending and consumer protection cases against Wells Fargo which resulted in settlements in 2012 valued at over \$15 million. Among other cases, Mr. Schlactus currently serves as lead counsel in *Johnson v. County of Cook*, a First Amendment and employment discrimination case against one of the largest public hospital systems in the country, and *National Fair Housing Alliance v. Buckingham*, a disability discrimination case against a large real estate developer and property management company in the Midwest.

Prior to joining Relman, Dane & Colfax in 2006, Mr. Schlactus was an associate at Skadden, Arps, Slate, Meagher & Flom LLP and Gilbert Heintz & Randolph LLP, where he litigated complex federal civil cases involving fair lending, consumer protection, and mass tort insurance coverage issues, and provided compliance counselling to companies with respect to predatory and discriminatory lending issues. Mr. Schlactus clerked for the Honorable Patricia M. Wald of the U.S. Court of Appeals for the D.C. Circuit. He is the co-author of *Creating and Protecting Pro-Integration Programs Under the Fair Housing Act*, in The Integration Debate: Competing Futures for American Cities (2009).

Mr. Schlactus received his law degree (1998) and undergraduate degree (1990) from Georgetown University.